

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
SADIE B. PEREZ, : **BANKR. NO. 18-10107**
DEBTOR :

**ORDER SCHEDULING EXPEDITED HEARING ON MOTION TO CONTINUE THE
AUTOMATIC STAY BEYOND THIRTY (30) DAY PERIOD**

AND NOW, this day of February, 2018, upon consideration of the Debtor's request for an expedited hearing on her Expedited Motion for Continuance of the Stay Beyond Thirty (30) Day Period ("Motion"), it is hereby

ORDERED that the Motion is GRANTED.

It is hereby ORDERED that the hearing on the Debtor's Expedited Motion to Continue the Automatic Stay in this case beyond 30 days is scheduled on February, 2018, at _____ M. in Courtroom 1, 900 Market St., Philadelphia, PA. 19107.

Copies of this Order, a Notice of Hearing consistent herewith, and the Motion shall -be served on all interested parties within 24 hours of the entry of this Order.

United States Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
SADIE B. PEREZ, : **BANKR. NO. 18-10107**
DEBTOR :

ORDER CONTINUING THE AUTOMATIC STAY BEYOND THIRTY (30) DAY PERIOD

AND NOW, this day of February, 2018, upon consideration of the Debtor's Expedited Motion for Continuance of the Stay Beyond Thirty (30) Day Period ("Motion"), and the Responses, thereto, if any, it is hereby

ORDERED that the Motion is GRANTED.

It is hereby ORDERED that the automatic stay in this case is extended beyond thirty (30) days after the duration of this case as to ALL creditors of the Debtor unless relief from same is granted.

United States Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
SADIE B. PEREZ, : **BANKR. NO. 18-10107**
DEBTOR :

**EXPEDITED MOTION (“MOTION”) FOR CONTINUANCE OF THE STAY BEYOND
THIRTY (30) DAY PERIOD**

The Debtor requests that the automatic stay arising from her above bankruptcy case filing be continued beyond the thirty (30) day period set forth in 11 U.S.C.

Section 362(c) (3), for the following reasons:

1. The Debtor filed this Chapter 13 bankruptcy case pro se on January 8, 2018. Counsel first met the Debtor and entered his appearance on her behalf on February 1, 2018.
2. The Debtor filed five prior bankruptcy cases, several of them pro se. Her most recent case before the instant case was filed at Bankr. No. 17-17553 on November 6, 2017 (“the Prior Case”). The Prior Case was dismissed on December 1, 2017, because the Debtor did not obtain debt counseling until after she filed and because she failed to file her Schedules and other documents.
3. The Debtor has obtained counsel, did obtain debt counseling after the Prior Case was filed and before this case was filed and counsel anticipates filing her Schedules and other documents prior to the date to which an extension to file her Schedules was granted, on February 5, 2018.
4. Since she filed this case pro se, the Debtor was not aware of the requirement that a motion to extend the automatic stay in this case beyond 30 days was necessary to obtain a permanent automatic stay as to all of her creditors, nor that any such motion must be heard within 30 days of the filing and she did not file such a motion or schedule it in a timely manner.
5. A hearing on this motion is respectfully requested on or before February 7, 2018, or she is granted an extension of the stay until the date of a hearing, in order that she is able to preserve the automatic stay in this case.

WHEREFORE, the Debtor requests that this Honorable Court will schedule an expedited hearing on this Motion on or before February 7, 2018, or continue the stay in effect until a scheduled hearing, and thereafter will grant the instant Motion requesting to extend the automatic stay beyond the thirty (30) day period and for the duration of this case.

Respectfully submitted,

/s/David A. Scholl

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